## Federal Defenders OF NEW YORK, INC.

SEP 02 2008

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RICHARD M. BERMAN

Southern District of New York John J. Byrnes Attorney-in-Charge

Leonard F. Joy Executive Director

August 29, 2008

## BY HAND

Honorable Richard M. Berman United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: <u>United States v. Sekou Camara</u>

08 Cr. 658

Dear Judge Berman:

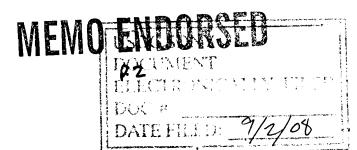
I write on behalf of my client, Sekou Camara, to request a modification of his bail conditions to allow him to travel to Senegal for his wedding.

On April 15, 2008, Judge Freeman imposed the following bail conditions: a \$250,000 personal recognizance bond cosigned by two financially responsible people and secured by \$2000 cash, travel restricted to Southern and Eastern Districts of New York, surrender of travel documents with no new applications, and regular pretrial supervision.

Mr. Camara is a natural-born United States citizen, but he and his family are Senegalese. He is engaged to be married to Sada Diagne in Dakar, Senegal.

At the time of his arrest, Mr. Camara and his fiancé had been planning their wedding - originally scheduled for June 14 - for over a year. On June 2, Judge Dolinger denied my request that Mr. Camara's bail be modified to permit him to attend the June 14 wedding. At the time, Mr. Camara's pretrial services officer, Clay Smith, said that he could not consent to the trip given the short amount of time he had been supervising Mr. Camara.

Mr. Camara and his fiancé are eager to get married and would like to do so on October 11, 2008. After the wedding, Sada will travel with Mr. Camara to New York. I ask that the Mr. Camara's bail conditions be modified so he can travel to Senegal for his wedding. Ideally, he would like to leave New York on October 4



and return with his wife at the end of October. He will provide to Clay Smith any requested information regarding his itinerary and will comply with all additional trip-related reporting requirements imposed by pretrial services.

Mr. Smith, who informs me that Mr. Camara has been complying with the conditions of his release and reporting as directed, and has no objection to the proposed trip. I have spoken to Assistant United States Attorney Seetha Ramachandran (212.637.2546) and, on behalf of the government, she opposes my requested modification.

If this request meets with Your Honor's approval, I ask that this letter be endorsed as an Order. Thank you for your consideration of this matter.

Respectfully submitted,

Peggy M. Cross

Assistant Federal Defender

Tel.: (212) 417-8732

SO ORDERED:

HONORABLE RICHARD M. BERMAN

United States Magistrate Judge

Government to file written response by AUSA Seetha Ramachandran (via fax) Conference scheduled for 9-10-09 at 11:30 am.

SO ORDERED:

Richard M. Berman, U.S.D.J.